

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 24-23663-CIV-BLOOM**

GOYARD ST-HONORE,

Plaintiff,

vs.

GOYARDBAGUS.COM;
GOYARDUKSALE.COM; AAAREPLICA.NU;
BAGSCOLL.SHOP a/k/a BLISSBAGS.SHOP
a/k/a LUXESBAG.SHOP a/k/a
TOPBAGSNEW.SHOP;
BUYQUALITYBAGS.COM a/k/a
TOPQUALITYBAGS.COM; BYANEITY.COM;
CASEBIG.COM; CASEFEELY.COM;
CASESHUNTER.COM;
CINDERELLASTORES.COM; CROZUS.COM;
DESIGNERMUSTHAVE.COM;
QKKBAG.SHOP a/k/a QNKBAG.SHOP a/k/a
WHWL BAG.SHOP a/k/a WMTBAG.SHOP
a/k/a WSHUBAG.SHOP a/k/a XKNBAG.SHOP;
GORCHIC.COM a/k/a GORCHIC.US; HIGH-
ENDBAGS01.COM; JOJOKKREPLICAS.COM;
KARANFRANK.RU; LUXEEBAG.COM;
LUXURYOUBAG.COM; MAFOL.SHOP;
MERCHPRINTZ.COM; PEESTY.COM a/k/a
TEMAAP.COM a/k/a TEMAFES.US;
RACASTUDYO.COM; TGEY.TOP;
THELUXHOUSE.NET;
THETOTETROVE.MYSHOPIFY.COM;
VINCYREP.RU; VIOKSHOP.COM;
VITTORIAPARUMBELL.COM; EACH AN
INDIVIDUAL, BUSINESS ENTITY, OR
UNINCORPORATED ASSOCIATION,

Defendants. _____/

AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff, Goyard St-Honore (“Plaintiff” or “Goyard”) hereby sues Defendants, the
Individuals, Business Entities, and Unincorporated Associations identified in the caption above,

which are set forth on Schedule “A” hereto (collectively “Defendants”). Defendants are promoting, selling, offering for sale, and/or distributing goods bearing and/or using counterfeits and confusingly similar imitations of Goyard’s trademarks within this district through various Internet based e-commerce stores operating under the seller names set forth on Schedule “A” (the “E-commerce Store Names”). In support of its claims, Goyard alleges as follows:

JURISDICTION AND VENUE

1. This is an action for damages and injunctive relief for federal trademark counterfeiting and infringement, false designation of origin, cybersquatting, common law unfair competition, and common law trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, 1125(a), and 1125(d), The All Writs Act, 28 U.S.C. § 1651(a), and Florida’s common law. Accordingly, this Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Goyard’s state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

2. Defendants are subject to personal jurisdiction in this district, because they direct business activities toward and conduct business with consumers throughout the United States, including within the State of Florida and this district through, at least, e-commerce stores¹ accessible and doing business in Florida and operating under their E-commerce Store Names. Alternatively, based on their overall contacts with the United States, Defendants are subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i)

¹ Certain Defendants use their E-commerce Store Names in tandem with electronic communication via private messaging applications and/or services in order to complete their offer and sale of counterfeit Goyard-branded products. Specifically, consumers are able to browse listings of Goyard-branded products online via Defendants’ respective E-commerce Store Names, ultimately directing customers to send inquiries, exchange data, and complete purchases via electronic communication with those Defendants.

Defendants are not subject to jurisdiction in any state's court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, non-residents in the United States and engaged in infringing activities and causing harm within this district by advertising, offering to sell, selling, and/or shipping infringing products into this district.

THE PLAINTIFF

4. Goyard is a foreign business entity organized under the laws of the Republic of France with its principal place of business located at 16 place Vendôme in Paris, France 75001. Goyard operates boutiques throughout the world, including within this district. Goyard is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, a variety of high-quality goods under multiple world-famous common law and federally registered trademarks, including those identified in Paragraph 15 below. Goyard offers for sale and sells its trademarked goods within the State of Florida, including this district and throughout the United States. Defendants, through the offer to sell and sale of counterfeit and infringing Goyard branded products, are directly and unfairly competing with Goyard's economic interests in the United States, including within the State of Florida and causing Goyard irreparable harm and damage within this jurisdiction.

5. Like many other famous trademark owners, Goyard suffers ongoing daily and sustained violations of its trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce and counterfeit Goyard's trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits across their e-commerce stores. The natural and intended byproduct of Defendants' combined

actions is the erosion and destruction of the goodwill associated with the Goyard name and associated trademarks and the destruction of the legitimate market sector in which it operates.

6. To combat the indivisible harm caused by the concurrent actions of Defendants and others engaging in similar conduct, each year Goyard expends significant monetary resources in connection with trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement. The exponential growth of counterfeiting over the Internet has created an environment that requires Goyard to expend significant resources across a wide spectrum of efforts to protect both consumers and itself from confusion and erosion of the goodwill embodied in Goyard's brand.

THE DEFENDANTS

7. Defendants are individuals, business entities of unknown makeup, or unincorporated associations each of whom, upon information and belief, either reside and/or operate in foreign jurisdictions or redistribute products from the same or similar sources in those locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants target their business activities toward consumers throughout the United States, including within this district, through the simultaneous operation of, at least, their commercial Internet based e-commerce stores under the E-commerce Store Names.

8. Certain Defendants operate under their respective E-commerce Store Names in tandem with electronic communication via private messaging applications and/or services, thereby creating an interconnected ecosystem which functions as an online marketplace operation.

9. Defendants use aliases in conjunction with the operation of their businesses, including but not limited to those identified by Defendant Number on Schedule "A."

10. Defendants are the past and/or present controlling forces behind the sale of products bearing and/or using counterfeits and infringements of Goyard's trademarks as described herein.

11. Defendants directly engage in unfair competition with Goyard by advertising, offering for sale, and selling goods each bearing and/or using counterfeits and infringements of one or more of Goyard's trademarks to consumers within the United States and this district through e-commerce stores using, at least, the E-commerce Store Names, as well as additional e-commerce store or seller identification aliases not yet known to Goyard. Defendants have purposefully directed some portion of their unlawful activities toward consumers in the State of Florida through the advertisement, offer to sell, sale, and/or shipment of counterfeit and infringing Goyard-branded goods into the State.

12. Defendants have registered, established or purchased, and maintained their E-commerce Store Names. Defendants may have engaged in fraudulent conduct with respect to the registration or maintenance of the E-commerce Store Names by providing false and/or misleading information to the relevant e-commerce platforms where they offer to sell and/or sell.

13. Defendants will likely continue to register or acquire new e-commerce store names, or other aliases, as well as related payment accounts, for the purpose of selling and/or offering for sale goods bearing and/or using counterfeit and confusingly similar imitations of one or more of Goyard's trademarks unless preliminarily and permanently enjoined.


14. Defendants' E-commerce Store Names, associated payment accounts, and any other alias e-commerce store or seller identification names used in connection with the sale of counterfeit and infringing goods bearing and/or using one or more of Goyard's trademarks, are essential components of Defendants' online activities and are one of the means by which Defendants further their counterfeiting and infringement schemes and cause harm to Goyard.



Moreover, Defendants are using Goyard's famous name and/or trademarks to drive Internet consumer traffic to at least one of their e-commerce stores operating under the E-commerce Store Names, thereby increasing the value of the E-commerce Store Names and decreasing the size and value of Goyard's legitimate marketplace and intellectual property rights at Goyard's expense.

COMMON FACTUAL ALLEGATIONS


Plaintiff's Business and Trademark Rights

15. Goyard is the owner of all rights in and to the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (collectively the "Goyard Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
	1,709,953	August 25, 1992	<p>IC 016 – Office requisites; namely, agendas and spare sheets therefor, repertories, desk pads, pen holders, stamp boxes for the storage of postage stamps, writing pads, address pads, pencil jars for desk use, ink wells, mail trays for desk use, note books, check cases and pen cases.</p> <p>IC 018 – Articles of fancy leather, leather, cloth and skin articles; namely, valises, travel trunks, cosmetic cases, travelling bags, handbags, brief cases, attache cases, brief case type document cases, toilet cases sold empty, makeup cases sold empty, sewing cases, wallets, hat boxes for travel, business card cases, key cases, drawstring pouches, garment bags for travel, necktie cases, jewel cases, umbrellas, saddle covers, cloth carriers, articles for dogs; namely, dog collars, dog leashes, dog clothes and carrying bags.</p>


Trademark	Registration Number	Registration Date	Class / Goods
GOYARD	1,821,224	February 15, 1994	<p>IC 016 – Office requisites; namely, agendas, repertories, note books, check cases and pen cases.</p> <p>IC 018 – Articles of fancy leather, leather, cloth and skin articles; namely, valises, travel trunks, cosmetic cases sold empty, traveling bags, handbags, briefcases, attache cases, briefcase type document cases, toilet cases sold empty, make-up cases sold empty, wallets, hat boxes for travel, business card cases, key cases, draw string pouches, garment bags for travel, necktie cases, umbrellas, saddlebags, saddle covers, and articles for dogs; namely, dog collars, dog leashes, dog clothes and carrying bags.</p>
 (E. Goyard Honore Paris)	3,418,288	April 29, 2008	<p>IC 018 – Bags and traveling sets, namely, traveling bags; garment bags for travel; luggage trunks; valises, vanity cases sold empty, rucksacks, handbags, beach bags, school bags; suitcases, briefcases, pocket wallets, purses, not of precious metal, leather key cases; business card cases; umbrellas, parasols, walking sticks.</p>
	4,036,898	October 11, 2011	<p>IC 003 – Toilet soap; perfumes; eau de toilette and eau de cologne; cosmetic preparations; essential oils for personal use; cosmetic milks; lotions for face and body care; cosmetic creams; emulsions for cosmetic use; shampoos; gels to be used on the face and body for aesthetic purposes; deodorants for personal use.</p> <p>IC 009 – Spectacles; spectacle frames; sunglasses; spectacle cases; photographic apparatus, namely, cameras.</p> <p>IC 014 – Precious metals and their alloys, other than for dental use; goods</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>made of precious metals and their alloys, other than for dental use, in the nature of jewelry, namely, rings, earrings, bracelets, charms, chains, watch chains, necklaces, pins, ornaments, fashion pins, ring bands; goods made of precious metals and their alloys, other than for dental use, namely, buckles of precious metal, hat ornaments of precious metal, jewellery cases of precious metal, jewellery caskets of precious metal; jewellery, precious stones, semi-precious stones, jewelry in the nature of pearls, horological and chronometric instruments; watches, watch straps, wristwatches; boxes for watches, jewelry boxes; cuff links.</p> <p>IC 018 – Goods of leather and imitations of leather, namely, travelling bags, travelling sets comprised of luggage, and garment bags for travel; trunks; suitcases; unfitted vanity cases; rucksacks; handbags; sports bags; beach bags; school bags; attaché cases; document cases; briefcases; school satchels; under-arm bags, namely, handbags; leather goods, namely, wallets, purses not of precious metal, leather key cases, card holders for wallets; umbrellas; parasols; sunshade parasols; walking sticks.</p> <p>IC 024 – Fabrics for textile use; textile goods, namely, bath linen not for clothing, household linen, bed linen, textile table linen, bathroom linen of textile, handkerchiefs of textile.</p> <p>IC 025 – Clothing for men, women and children, namely, dresses, skirts,</p>

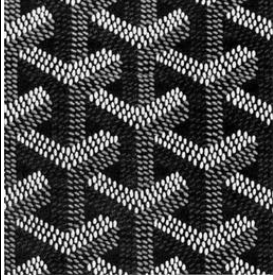
Trademark	Registration Number	Registration Date	Class / Goods
			<p>petticoats, culottes, ladies' suits, trousers, shorts, Bermuda shorts, swimming drawers, shirts, ladies' shirts, blouses, tee-shirts, sweatshirts, waistcoats, jackets, cardigans, pullovers, sweaters, parkas, anoraks, coats, gaberdines, raincoats, furs, sashes for wear, shawls, scarf, gloves, neckties, belts, socks, stockings, tights, underwear, pajamas, dressing gowns, swimsuits, bath robes; footwear, except orthopedic footwear, namely, shoes, sandals, boots, half-boots, boot liners, slippers; hats, berets, caps.</p> <p>IC 028 – Games, namely, chess games; gymnastic and sporting articles not included in other classes, namely, baseball gloves, bats for games, boxing gloves, golf gloves, golf clubs, golf bags; decorations for Christmas trees.</p>
	5,532,309	August 7, 2018	<p>IC 009 – Spectacles, sunglasses, spectacle cases, spectacle frames, spectacle cords; protective cases for portable telephones, tablet computers, electronic diaries and computers; portable telephones shell cases, portable telephone straps; cases especially made for photographic apparatus and instruments; binoculars being optics; cases for binoculars; magnifying glasses being optics; cases for magnifying glasses; digital photo frames; blank USB flash drives; mouse pads; barometers; dog whistles, cases for dog whistles.</p> <p>IC 014 – Jewelry, namely, finger rings, key rings, earrings, cufflinks, cases for cuff links, bracelets, charms, brooches, jewelry chains, necklaces, presentation boxes for jewelry, ornaments being</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>jewelry, medallions being jewelry, jewelry boxes; tie pins, tie clips; timepieces and chronometric apparatus and instruments, namely, watches, straps for wrist watches, presentation boxes for watches, cases being parts of watches, alarm clocks; boxes of precious metals, their alloys or coated therewith.</p> <p>IC 016 – Printed matter, namely, posters, photo albums, greeting cards, postcards; printed matter, namely, books, magazines, orientation manuals, photographs, periodicals in the field of leather goods, travel goods, leather accessories and bags, pet accessories, clothing and fashion accessories; checkbook holders; products made of cardboard or paper, namely, boxes of cardboard or paper, hat boxes of cardboard, bags being envelopes and pouches of cardboard or paper for packaging, paper table cloths, perfumed and non-perfumed drawer liners of paper, money clips, passport holders, table napkins of paper; office requisites excluding furniture, namely, diaries, stationery pads, notebooks, binders, cases for stamps, cases for stationery, paper knives, diary covers being stationery, letter trays, writing sets comprising inkstands and stationery, envelopes being stationery, shields being paper seals, writing paper, trays for sorting and counting money, document holders, paperweights, telephone indexes, desk pads, stamps, namely, sealing stamps; writing instruments, namely, pens, ball-point pens, propelling pencils, pencil holders, pencil cases.</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>IC 018 – Products made of leather or imitations of leather, namely, straps of leather, leather leashes, boxes of leather or imitation leather, wallets of leather or imitation leather, briefcases of leather; traveling trunks, traveling bags, leather traveling sets, namely, leather cases and pouch sets for travel, garment bags for travel; trunks, attache cases, suitcases; unfitted vanity cases, backpacks, handbags, beach bags, sports bags, bags for carrying animals, briefcases, purses, wallets, coin purses, key cases being leather products, card cases being wallets, credit card holders being wallets; umbrellas, umbrella sticks, walking sticks, walking stick seats, collars for animals, animal leashes; clutch bags.</p> <p>IC 024 – Fabrics and textile products, namely, textile wall hangings, household linen, bed linen, table linen of textile, bath linen except clothing, handkerchiefs of textile, covers for cushions, unfitted fabric chair covers, traveling rugs, lap robes.</p> <p>IC 025 – Clothing, namely, suspenders, belts being clothing, neckties, socks, shawls, sashes for wear, scarves, gloves, bathing suits, bath robes, pocket squares being clothing; footwear, namely, sandals, boots, slippers; headgear, namely, hats, berets, caps being headwear.</p>


Trademark	Registration Number	Registration Date	Class / Goods
	5,742,053	May 07, 2019	<p>IC 009 – Spectacles; sunglasses; spectacle cases; spectacle frames; spectacle cords; protective cases for mobile telephones, tablets, electronic diaries and computers; mobile telephone shell cases; mobile telephone straps; cases especially made for photographic apparatus and instruments; binoculars; cases for binoculars; magnifying glasses; cases for magnifying glasses; digital photo frames; USB flash drives sold blank; mouse pads; barometers; dog whistles; cases for dog whistles</p> <p>IC 014 – Jewelry, namely, finger rings, key rings, earrings, bracelets, charms being jewelry, brooches, chains being jewelry, necklaces, presentation boxes for jewelry, ornaments of precious metal in the nature of jewelry, medallions; cuff links; cases for cuff links; jewelry boxes; tie pins; tie clips; time pieces; chronometric apparatus and instruments, namely, watches; watch bands; watch cases; presentation cases for watches; alarm clocks; boxes of precious metals, their alloys or coated therewith; all the aforesaid goods of French origin or made in France</p> <p>IC 016 – Printed matter, namely, posters, photograph albums, greeting cards, postcards; printed matter, namely, books, magazines, orientation manuals, periodicals all featuring fashion information relating to leather goods, travel products, leather accessories and bags, pet accessories, clothing and fashion accessories; photographs; checkbook holders; products made of cardboard or paper, namely, boxes of cardboard or paper, hat boxes of cardboard, bags being pouches of</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>cardboard or paper for packing; paper table cloths; perfumed and non-perfumed drawer liners of paper; money clips; passport holders; table napkins of paper; office requisites, not being furniture, namely, diaries, stationery pads, notebooks, binders, cases for stamps, cases for stationery, paper knives, diary covers being stationery, letter trays, writing sets comprised of inkstands and stationery, envelopes being stationery, shields being paper seals, writing paper, trays for sorting and counting money, document holders, paper weights, telephone indexes, desk pads, stamps; writing instruments, namely, pens, ball-point pens, propelling pencils, pencil holders, pencil cases</p> <p>IC 018 – Products made of leather or imitations of leather, namely, straps in the nature of belts of leather, leather leashes, boxes of leather or imitation leather, wallets of leather or imitation leather, briefcases of leather; traveling trunks; traveling bags; travelling sets consisting of leather cases and pouch sets for travel; garment bags for travel; trunks; attaché cases, suitcases; vanity cases sold empty; backpacks; handbags; beach bags; sports bags; bags for carrying animals; briefcases; purses; wallets; coin purses; key cases of leather; card cases being wallets; credit card holders being wallets; umbrellas; umbrella sticks; walking sticks; walking stick seats; collars for animals; leashes for animals; clutch bags; all the aforesaid goods of French origin or made in France</p> <p>IC 024 – Fabrics and textile products, namely, textile wall hangings,</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>household linen, bed linen, table linen of textile, bath linen not being clothing, handkerchiefs of textile, covers for cushions, unfitted chair covers not of paper, traveling rugs, lap robes</p> <p>IC 025 – Clothing, namely, suspenders, belts being clothing, neckties, socks, shawls, sashes for wear, scarves, gloves, bathing suits, bath robes, pocket squares; footwear, namely, sandals, boots, slippers; headgear, namely, hats, berets, caps being headwear; all the aforesaid goods of French origin or made in France</p>
	5,753,841	May 21, 2019	<p>IC 003 – Cosmetic kits comprised of non-medicated cosmetics, perfumes, eaux de toilette, scented linen waters, essential oils for personal use; fumigation products, namely, incenses; soaps, namely, skin soaps; cosmetic preparations for toilet use and beauty care, namely, cosmetic preparations for body care and skin care; shoe polish, creams for leather</p> <p>IC 009 – Spectacles; sunglasses; spectacle cases; spectacle frames; spectacle cords; protective cases for portable telephones, tablets, electronic diaries and computers; cases for portable telephones, portable telephone straps; cases especially made for photographic apparatus and instruments; binoculars; cases for binoculars; magnifying glasses; cases for magnifying glasses; digital photo frames; USB flash drives sold blank; mouse pads; barometers; dog whistles; cases for dog whistles</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>IC 014 – Jewelry, namely, finger rings, key rings, earrings, cuff links, cases for cuff links, bracelets, charms, brooches, chains, necklaces, jewelry caskets, ornamental lapel pins, jewelry medallions; jewelry boxes; tie pins, tie clips; timepieces; chronometric instruments and apparatus, namely, watches, watchbands, cases for watches, alarm clocks; boxes of precious metals, their alloys or coated therewith</p> <p>IC 016 – Printed matter, namely, posters, photo albums, greeting cards, postcards; printed matter, namely, books, magazines, orientation manuals and periodicals in the field of leather goods, travel goods, leather accessories and bags, pet accessories, clothing and fashion accessories, photographs; checkbook holders; products made of cardboard or paper, namely, boxes of cardboard or paper, hat boxes of cardboard, bags, namely envelopes and pouches of cardboard or paper for merchandise packaging; paper table cloths; perfumed and non-perfumed drawer liners of paper; money clips; passport holders; table napkins of paper; office requisites, excluding furniture, namely, diaries, stationery writing pads, notebooks, binders, cases for stamps, cases for stationery, paper knives, covers for stationery diaries, letter trays, writing sets comprised of inkstands and stationery, stationery envelopes, shields being paper seals, writing paper, trays for sorting and counting money, document holders, paperweights, telephone indexes, desk pads, postage stamps; writing instruments, namely, pens, ball-point pens, propelling pencils, pencil holders, pencil cases</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>IC 018 – Goods made of leather or imitations leather, namely, leather shoulder straps, leather cords; leather or imitation leather boxes; leather or imitation leather small handbags; leather briefcases; travel trunks; travel bags; leather cases and pouch sets for travel; garment bags for travel; travelling trunks, attaché cases, suitcases; vanity cases sold empty; backpacks; handbags; beach bags; sports bags; bags for carrying animals; briefcases; wallets; purses; coin purses; leather goods, namely, key cases; card holders in the nature of a wallet; credit card holders in the name of a wallet; umbrellas, umbrella sticks; walking sticks; walking stick seats; collars for animals; animal leashes; clutch bags</p> <p>IC 021 – Soap boxes; glass bottles sold empty; drinking bottles; bowls; tea sets, tea caddies, picnic baskets sold empty; shoe brushes; eyebrow brushes; toilet brushes; nail brushes</p> <p>IC 024 – Fabrics and textile products, namely, textile wall hangings, household linen, bed linen, textile table linen, bath linen, excluding clothing; textile handkerchiefs; covers for cushions; unfitted chair covers; travel blankets; lap robes</p> <p>IC 025 – Clothing, namely, suspenders, belts, neckties, socks, shawls, sashes for wear, scarves, gloves, bathing suits, bath robes, pocket squares; clothing, namely, footwear, sandals, boots, slippers; headwear, namely, hats, berets, caps</p> <p>IC 028 – Parlor games; toys for pets; playing cards; ornaments for Christmas</p>

Trademark	Registration Number	Registration Date	Class / Goods
			trees, except illumination articles and confectionery; golf bags with or without wheels; bags and covers for tennis rackets; covers for petanque balls
	6,641,574	February 15, 2022	<p>IC 009 – Spectacles, sunglasses, spectacle cases, spectacle frames, spectacle accessories namely spectacle cords; protective cases and accessories for mobile telephones, tablets, electronic agendas, and computers namely hand free mobile phone kits, mobile phone earphones, protective cases for mobile phone earphones, special holders for mobile phone, tablets and computers; portable telephones shell cases, portable telephone straps; cases especially made for photographic apparatus and instruments; binoculars used for optics, cases for binoculars; magnifying glasses used for optics, cases for magnifying glasses; digital photo frames; blank USB flash drives; mouse pads; barometers; dog whistles, cases for dog whistles</p> <p>IC 014 – Jewelry, namely, finger rings used as jewelry; key rings; earrings; cuff links; cases for cuff links; bracelets used as jewelry; charms; brooches; chains used as jewelry; necklaces; jewelry caskets; ornaments in the nature of jewelry; medallions in the nature of jewelry; jewelry boxes; tie pins; tie clips; timepieces; chronometric instruments and apparatus, namely, watches; watchbands; cases for watches; boxes for watches; alarm clocks; boxes of precious metals, their alloys or coated therewith</p> <p>IC 024 – Fabric and textile goods, namely, wall hangings of textile</p>

Trademark	Registration Number	Registration Date	Class / Goods
			materials; household linen; bed linen; table linen of textile materials; bath linen with the exception of clothing; beach towels; handkerchiefs of textile materials; cushion covers; unfitted fabric chair covers; traveling rugs; lap robes IC 025 – Clothing, namely, suspenders, belts being clothing, socks, neckties, shawls, long scarves, scarves, gloves, bathing suits, bathrobes, pocket squares being clothing; footwear being clothing, namely, sandals, boots, slippers; headwear, namely, hats, berets, caps
GOYARD	7,008,371	March 28, 2023	IC 009 – Spectacles, sunglasses, spectacle cases, spectacle frames, spectacle cords; protective cases for portable telephones, tablets, electronic diaries and computers; portable telephones shell cases, portable telephone straps; cases especially made for photographic apparatus and instruments; binoculars used for optics, cases for binoculars; magnifying glasses used for optics; cases for magnifying glasses; digital photo frames; blank USB flash drives; mouse pads; barometers; dog whistles, cases for dog whistles

The Goyard Marks are used in connection with the manufacture and distribution of high-quality goods in the categories identified above. True and correct copies of the Certificates of Registration for the Goyard Marks are attached hereto as Composite Exhibit “1.”

16. The Goyard Marks have been used in interstate commerce to identify and distinguish Goyard’s high-quality goods for an extended period of time.

17. The Goyard Marks have been used in commerce by Goyard long prior in time to Defendants' use of copies of those Marks. The Goyard Marks have never been assigned or licensed to any of the Defendants in this matter.

18. The Goyard Marks are symbols of Goyard's quality, reputation and goodwill and have never been abandoned. Goyard has continuously used the Goyard Marks since registration.

19. The Goyard Marks are well-known and famous and have been for many years. Goyard expends substantial resources developing, advertising, and otherwise promoting the Goyard Marks and products bearing the Goyard Marks. The Goyard Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

20. Goyard extensively uses, advertises, and promotes the Goyard Marks in the United States in association with the sale of high-quality goods and has carefully monitored and policed the use of the Goyard Marks.

21. As a result of Goyard's efforts, consumers readily identify merchandise bearing or sold using the Goyard Marks as being high quality goods sponsored and approved by Goyard.

22. Accordingly, the Goyard Marks have achieved secondary meaning among consumers as identifiers of high-quality goods.

23. Genuine goods bearing and/or using the Goyard Marks are widely legitimately advertised, promoted, and offered for sale by Goyard, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines, is important to Goyard's overall marketing and consumer education efforts. Thus, Goyard expends significant monetary and other resources on Internet marketing and consumer education regarding its products, including search engine optimization ("SEO") and search engine marketing ("SEM"). Those strategies allow Goyard and its authorized retailers to educate consumers fairly and

legitimately about the value associated with the Goyard brand and the goods sold thereunder, and the problems associated with the counterfeiting of Goyard's trademarks.

Defendants' Infringing Activities

24. Defendants are each promoting, advertising, distributing, offering for sale, and/or selling goods in interstate commerce bearing and/or using counterfeit and confusingly similar imitations of one or more of the Goyard Marks (the "Counterfeit Goods") through at least the e-commerce stores operating under the E-commerce Store Names. Specifically, Defendants are each using the Goyard Marks to initially attract online consumers and drive them to Defendants' e-commerce stores operating under their E-commerce Store Names. Defendants are each using identical copies of one or more of the Goyard Marks for different quality goods. Goyard has used the Goyard Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Goyard's merchandise.

25. Defendants' Counterfeit Goods are of a quality substantially different than that of Goyard's genuine goods. Defendants are actively using, promoting and otherwise advertising, distributing, offering for sale, and/or selling substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine high-quality goods offered for sale by Goyard, despite Defendants' knowledge that they are without authority to use the Goyard Marks. Defendants' actions are likely to cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe all of Defendants' goods offered for sale in or through Defendants' e-commerce stores are genuine goods originating from, associated with, and/or approved by Goyard.

26. Defendants advertise their e-commerce stores, including their Counterfeit Goods offered for sale, to the consuming public via e-commerce stores on, at least, the E-commerce Store

Names. In so doing, Defendants improperly and unlawfully use one or more of the Goyard Marks without Goyard's permission.

27. Defendants are concurrently employing and benefiting from substantially similar advertising and marketing strategies based, in large measure, upon an unauthorized use of counterfeits and infringements of the Goyard Marks. Specifically, Defendants are using counterfeits and infringements of Goyard's famous name and the Goyard Marks to make their e-commerce stores selling unauthorized goods appear more relevant and attractive to consumers searching for both Goyard and non-Goyard goods and information online. By their actions, Defendants are jointly contributing to the creation and maintenance of an unlawful marketplace operating in parallel to the legitimate marketplace for Goyard's genuine goods. Defendants are causing individual, concurrent, and indivisible harm to Goyard and the consuming public by (i) depriving Goyard and other third parties of their right to fairly compete for space online and within search engine results and reducing the visibility of Goyard's genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with the Goyard Marks by viewing inferior products in either the pre or post sale setting, and/or (iii) increasing Goyard's overall cost to market its goods and educate consumers about its brand via the Internet.

28. Defendants are concurrently conducting and targeting their counterfeiting and infringing activities toward consumers and likely causing unified harm within this district and elsewhere throughout the United States. As a result, Defendants are defrauding Goyard and the consuming public for Defendants' own benefit.

29. At all times relevant hereto, Defendants have had full knowledge of Goyard's ownership of the Goyard Marks, including its exclusive right to use and license such intellectual property and the goodwill associated therewith.

30. Defendants' use of the Goyard Marks, including the promotion and advertisement, reproduction, distribution, sale and offering for sale of their Counterfeit Goods, is without Goyard's consent or authorization.

31. Defendants are engaging in the above-described unlawful counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Goyard's rights for the purpose of trading on Goyard's goodwill and reputation.

32. Defendants' above identified infringing activities are likely to cause confusion, deception, and mistake in the minds of consumers before, during and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive consumers, the public, and the trade into believing there is a connection or association between Goyard's genuine goods and Defendants' Counterfeit Goods, which there is not.

33. Moreover, Defendant Numbers 1-2 (the "Cybersquatting Defendants") have registered their respective E-commerce Store Names using marks that are nearly identical and/or confusingly similar to at least one of the Goyard Marks (collectively the "Cybersquatted E-commerce Store Names").

34. The Cybersquatting Defendants have registered and/or used the Cybersquatted E-commerce Store Names with the bad faith intent to profit from the Goyard Marks.

35. The Cybersquatting Defendants do not have, nor have they ever had, the right or authority to use the Goyard Marks for any purpose. Further, the Goyard Marks have never been assigned or licensed to be used on any of the e-commerce stores operating under the Cybersquatted E-commerce Store Names.

36. Upon information and belief, the Cybersquatting Defendants have provided false and/or misleading contact information when applying for the registration of the Cybersquatted E-

commerce Store Names or have intentionally failed to maintain accurate contact information with respect to the registration of the Cybersquatted E-commerce Store Names.

37. The Cybersquatting Defendants have never used any of the Cybersquatted E-commerce Store Names in connection with a bona fide offering of goods or services.

38. The Cybersquatting Defendants have not made any bona fide non-commercial or fair use of the Goyard Marks on a website accessible under any of the Cybersquatted E-commerce Store Names.

39. The Cybersquatting Defendants have intentionally incorporated at least one of the Goyard Marks in their Cybersquatted E-commerce Store Names to divert consumers looking for Goyard's genuine Internet e-commerce store to their own Internet e-commerce stores for commercial gain.

40. Given the visibility of Defendants' various e-commerce stores and the similarity of their concurrent actions, it is clear Defendants are either affiliated, or at a minimum, cannot help but know of each other's existence and the unified harm likely to be caused to Goyard and the overall consumer market in which they operate because of Defendants' concurrent actions.

41. Although some Defendants may be physically acting independently, they may properly be deemed to be acting in concert because the combined force of their actions serves to multiply the harm caused to Goyard.

42. Defendants' payment and financial accounts, including but not limited to those specifically set forth on Schedule "A," are being used by Defendants to accept, receive, and deposit profits from Defendants' trademark counterfeiting and infringing, and unfairly competitive activities connected to their E-commerce Store Names, and any other alias e-commerce store names being used and/or controlled by them.

43. Further, Defendants, upon information and belief, are likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Goyard.

44. Goyard has no adequate remedy at law.

45. Goyard is suffering irreparable injury and has suffered substantial damages because of Defendants' unauthorized and wrongful use of the Goyard Marks. If Defendants' intentional counterfeiting, infringing, and unfairly competitive activities are not preliminarily and permanently enjoined by this Court, Goyard and the consuming public will continue to be harmed while Defendants wrongfully earn a substantial profit.

46. The harm and damages sustained by Goyard has been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods.

COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT
PURSUANT TO § 32 OF THE LANHAM ACT (15 U.S.C. § 1114)

47. Goyard hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 46 above.

48. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeit and confusingly similar imitations of the Goyard Marks in commerce in connection with the promotion, advertisement, distribution, offering for sale, and sale of the Counterfeit Goods.

49. Defendants are promoting and otherwise advertising, selling, offering for sale and distributing goods bearing and/or using counterfeits and/or infringements of one or more of the Goyard Marks. Defendants are continuously infringing and inducing others to infringe the Goyard Marks by using one or more of them to advertise, promote, offer to sell and/or sell counterfeit and infringing Goyard branded goods.

50. Defendants' concurrent counterfeiting and infringing activities are likely to cause and are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods.

51. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damages and irreparable harm to Goyard and are unjustly enriching Defendants with profits at Goyard's expense.

52. Defendants' above-described unlawful actions constitute counterfeiting and infringement of the Goyard Marks in violation of Goyard's rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

53. Goyard has suffered and will continue to suffer irreparable injury and damages while Defendants are earning a substantial profit due to Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined.

COUNT II - FALSE DESIGNATION OF ORIGIN
PURSUANT TO § 43(a) OF THE LANHAM ACT (15 U.S.C. § 1125(a))

54. Goyard hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 46 above.

55. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of one or more of the Goyard Marks have been widely advertised and offered for sale throughout the United States via the Internet.

56. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of one or more of the Goyard Marks are virtually identical in appearance to Goyard's genuine goods. However, Defendants' Counterfeit Goods are different in quality. Accordingly, Defendants' activities are likely to cause confusion among consumers as to at least the origin or sponsorship of their Counterfeit Goods.

57. Defendants have used in connection with their advertisement, offer for sale, and sale of their Counterfeit Goods, false designations of origin and false descriptions and representations, including words or other symbols and designs that falsely describe or represent such goods and have caused such goods to enter into commerce in the United States with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Goyard's detriment.

58. Defendants have each authorized infringing uses of one or more of the Goyard Marks, in Defendants' advertisement and promotion of their counterfeit and infringing branded goods. Some Defendants have also misrepresented to members of the consuming public that the Counterfeit Goods they advertise and sell are genuine, non-infringing goods.

59. Additionally, Defendants are simultaneously using counterfeits and infringements of one or more of the Goyard Marks to unfairly compete with Goyard and others for space within organic and paid search engine results. Defendants are thereby jointly (i) depriving Goyard of valuable marketing and educational space online which would otherwise be available to Goyard, and (ii) reducing the visibility of Goyard's genuine goods on the World Wide Web.

60. Defendants' above-described actions are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

61. Goyard has no adequate remedy at law and has sustained both individual and indivisible injury and damages caused by Defendants' concurrent conduct. Absent an entry of an injunction by this Court, Goyard will continue to suffer irreparable injury to its goodwill and business reputation, as well as monetary damages, while Defendants are unjustly profiting.

**COUNT III - CLAIM FOR RELIEF FOR CYBERSQUATTING
PURSUANT TO § 43(d) OF THE LANHAM ACT (15 U.S.C. § 1125(d))
(Against Defendant Numbers 1 through 2 only)**

62. Goyard hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 46 above.

63. At all times relevant hereto, Goyard has been and still is the owner of the rights, title, and interest in and to the Goyard Marks.

64. The Cybersquatting Defendants have acted with the bad faith intent to profit from the Goyard Marks and the goodwill associated with the Goyard Marks by registering and using the Cybersquatted E-commerce Store Names.

65. The Goyard Marks were already distinctive and famous at the time the Cybersquatting Defendants registered the Cybersquatted E-commerce Store Names.

66. The Cybersquatting Defendants have no intellectual property rights in or to the Goyard Marks.

67. The Cybersquatted E-commerce Store Names are identical to, confusingly similar to, or dilutive of one or more of the Goyard Marks.

68. The Cybersquatting Defendants' conduct is done with knowledge and constitutes a willful violation of Goyard's rights in the Goyard Marks. At a minimum, the Cybersquatting Defendants' conduct constitutes reckless disregard for and willful blindness to Goyard's rights.

69. The Cybersquatting Defendants' actions constitute cybersquatting in violation of § 43(d) of the Lanham Act, 15 U.S.C. § 1125(d).

70. Goyard has no adequate remedy at law.

71. Goyard has suffered and will continue to suffer irreparable injury and damages due to the above-described activities if these Defendants are not preliminarily and permanently enjoined, while the Cybersquatting Defendants are unjustly profiting.

COUNT IV - COMMON LAW UNFAIR COMPETITION.

72. Goyard hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 46 above.

73. This is an action against Defendants based on their promotion, advertisement, distribution, offering for sale, and/or sale of goods bearing and/or using marks that are virtually identical to one or more of the Goyard Marks in violation of Florida's common law of unfair competition.

74. Specifically, Defendants are each promoting and otherwise advertising, selling, offering for sale, and distributing goods bearing and/or using counterfeits and infringements of one or more of the Goyard Marks. Defendants are also each using counterfeits and infringements of one or more of the Goyard Marks to unfairly compete with Goyard and others for (i) space in search engine results across an array of search terms and (ii) visibility on the World Wide Web.

75. Defendants' infringing activities are likely to cause and are causing confusion, mistake and deception among consumers as to the origin and quality of Defendants' e-commerce stores as a whole and all products sold therein by their use of the Goyard Marks.

76. Goyard has no adequate remedy at law and has suffered and will continue to suffer irreparable injury and damages because of Defendants' concurrent actions while Defendants are unjustly profiting due to their above-described activities if Defendants are not preliminarily and permanently enjoined.

COUNT V - COMMON LAW TRADEMARK INFRINGEMENT

77. Goyard hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 46 above.

78. Goyard is the owner of all common law rights in and to the Goyard Marks.

79. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and sale of their Counterfeit Goods using one or more of the Goyard Marks.

80. Specifically, each Defendant is promoting and otherwise advertising, distributing, offering for sale, and selling goods bearing and/or using infringements of one or more of the Goyard Marks.

81. Defendants' infringing activities are likely to cause and are causing confusion, mistake, and deception among consumers as to the origin and quality of Defendants' Counterfeit Goods bearing and/or using the Goyard Marks.

82. Goyard has no adequate remedy at law and has suffered and will continue to suffer irreparable injury and damages because of Defendants' concurrent actions while Defendants are unjustly profiting due to their above-described activities if Defendants are not preliminarily and permanently enjoined.

PRAYER FOR RELIEF

83. WHEREFORE, Goyard demands judgment on all Counts of this Amended Complaint and an award of equitable relief and monetary relief against Defendants as follows:

a. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in

concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting the Goyard Marks; from using the Goyard Marks, or any mark or design similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or trademark or design that may be calculated to falsely advertise the services or goods of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Goyard; from falsely representing themselves as being connected with Goyard, through sponsorship or association, or engaging in any act that is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants, are in any way endorsed by, approved by, and/or associated with Goyard; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of the Goyard Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants; from affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent Defendants' goods as being those of Goyard, or in any way endorsed by Goyard and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of Goyard's name or trademarks and from otherwise unfairly competing with Goyard.

b. Entry of temporary, preliminary, and permanent injunctions pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, enjoining Defendants and all third parties with actual notice of an injunction issued by the Court from participating in, including providing financial services, technical services or other support to, Defendants in connection with the sale and distribution of non-genuine goods bearing and/or using counterfeits of the Goyard Marks.

c. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Goyard's request, those acting in concert or participation as service providers to Defendants, who have notice of the injunction, cease hosting, facilitating access to, or providing any supporting service to any and all e-commerce stores, including but not limited to the E-commerce Store Names, through which Defendants engage in the promotion, offering for sale and/or sale of goods bearing and/or using counterfeits and/or infringements of the Goyard Marks.

d. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority that, upon Goyard's request, any Internet marketplace website operators, administrators, registrars, and/or top level domain (TLD) Registries for the E-commerce Store Names and any other alias e-commerce store names being used by Defendants who are provided with notice of an injunction issued by the Court identify any e-mail address known to be associated with Defendants' E-commerce Store Names.

e. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, authorizing Goyard to serve an injunction issued by the Court on any e-mail service provider with a request that the service provider permanently suspend the e-mail addresses that are or have been used by Defendants in connection with Defendants' promotion, offering for sale, and/or sale of goods bearing and/or using counterfeits, and/or infringements of the Goyard Marks.

f. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority authorizing Goyard to serve the injunction on the e-commerce store's registrar(s) and/or the privacy protection service(s) for the E-commerce Store Names to

disclose to Goyard the true identities and contact information for the registrants of the E-commerce Store Names.

g. Entry of an Order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, that upon Goyard's request, Defendants and the top level domain (TLD) Registry for each of the E-commerce Store Names, or their administrators, including backend registry operators or administrators, place the E-commerce Store Names, and any other e-commerce store names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing and/or using counterfeits and infringements of the Goyard Marks, on Registry Hold status for the remainder of the registration period for any such e-commerce store, thus removing them from the TLD zone files that link the E-commerce Store Names, and any other e-commerce store names used by Defendants, to the IP addresses where the associated e-commerce store names are hosted.

h. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, canceling for the life of the current registration or, at Goyard's election, transferring the E-commerce Store Names and any other e-commerce store names used by Defendants to engage in their counterfeiting of the Goyard Marks at issue to Goyard's control so they may no longer be used for unlawful purposes.

i. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority authorizing Goyard to request any Internet search engines or service provider referring or linking users to any Uniform Resource Locator ("URL") of the E-commerce Store Names, which are provided with notice of the order, to permanently disable, de-index or delist all URLs of the E-commerce Store Names and/or permanently disable the references or links to all URLs of the E-commerce Store Names used by Defendants to promote, offer for sale and/or

sell goods bearing and/or using counterfeits and/or infringements of the Goyard Marks, based upon Defendants' unlawful activities being conducted via the E-commerce Store Names as a whole and via any specific URLs identified by Goyard.

j. Entry of an Order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendants, their agent(s) or assign(s), to assign all rights, title, and interest, to their E-commerce Store Name(s), and any other e-commerce store names used by Defendants, to Goyard and, if within five (5) days of entry of such Order Defendants fail to make such an assignment, the Court order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

k. Entry of an Order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendants, their agent(s) or assign(s), to instruct in writing all search engines to permanently delist or deindex the E-commerce Store Name(s), any other e-commerce store names used by Defendants, and, if within five (5) days of entry of such Order Defendants fail to make such a written instruction, the Court order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

l. Entry of an Order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendants, their agent(s) or assign(s) to instruct the Registrar(s) for each E-commerce Store Name(s) in writing to permanently close the registration account(s) in which any E-commerce Store Name(s) are located and, if within five (5) days of entry of such Order Defendants fail to make such a written instruction, the Court order the act to be done by another

person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

m. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Goyard's request, any messaging service and Internet marketplace and website operators and/or administrators who are provided with notice of an injunction issued by the Court, permanently remove any and all listings and associated images of goods bearing and/or using counterfeits and/or infringements of the Goyard Marks via the e-commerce stores operating under the E-commerce Store Names, and upon Goyard's request, any other listings and images of goods bearing and/or using counterfeits and/or infringements of the Goyard Marks associated with or linked to the same sellers or linked to any other alias e-commerce store names being used and/or controlled by Defendants to promote, offer for sale and/or sell goods bearing and/or using counterfeits and/or infringements of the Goyard Marks.

n. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, Federal Rule of Civil Procedure 65, and this Court's inherent authority that, upon Goyard's request, Defendants and any Internet platform or marketplace website operators and/or administrators of the E-commerce Store Names who are provided with notice of an injunction issued by the Court, immediately cease fulfillment of and sequester all goods of each Defendant bearing one or more of the Goyard Marks in its inventory, possession, custody, or control, and surrender those goods to Goyard.

o. Entry of an Order requiring, upon Goyard's request, Defendants to request in writing permanent termination of any messaging services, e-commerce store names, usernames, and social media accounts they own, operate, or control on any messaging service, e-commerce marketplace, and social media website.

p. Entry of an Order requiring Defendants to account to and pay Goyard for all profits and damages resulting from Defendants' trademark counterfeiting and infringing and unfairly competitive activities and that the award to Goyard be trebled, as provided for under 15 U.S.C. §1117, or that Goyard be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product type offered for sale or sold, as provided by 15 U.S.C. §1117(c)(2) of the Lanham Act.

q. Entry of an Order requiring Defendant Numbers 1-2 to account to and pay Goyard for all profits and damages resulting from Defendant Numbers 1-2's cybersquatting activities and that the award to Goyard be trebled, as provided for under 15 U.S.C. § 1117, or that Goyard be awarded statutory damages from Defendant Numbers 1-2 in the amount of one hundred thousand dollars (\$100,000.00) per cybersquatted e-commerce store name used as provided by 15 U.S.C. § 1117(d) of the Lanham Act.

r. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Goyard's costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

s. Entry of an Order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, Federal Rule of Civil Procedure 65, and the Court's inherent authority that, upon Goyard's request, Defendants and any financial institutions, payment processors, banks, escrow services, money transmitters, e-commerce shipping partner, fulfillment center, warehouse, storage facility, or marketplace platforms, and their related companies and affiliates, identify, restrain, and be required to surrender to Goyard all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the E-commerce Store Names, or other alias e-commerce store names used by Defendants presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds

into the same financial institution account(s), and remain restrained until such funds are surrendered to Goyard in partial satisfaction of the monetary judgment entered herein.

t. Entry of an award of pre-judgment interest on the judgment amount.

u. Entry of an Order requiring Defendants, at Goyard's request, to pay the cost necessary to correct any erroneous impression the consuming public may have received or derived concerning the nature, characteristics, or qualities of Defendants' products, including without limitation, the placement of corrective advertising and providing written notice to the public.

v. Entry of an Order for any further relief as the Court may deem just and proper.

DATED: October 4, 2024.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar No. 103372)

Annie O'Leary (Fla. Bar No. 1050009)

401 East Las Olas Blvd., Suite 130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: Stephen@smgpa.cloud

E-mail: Leo@smgpa.cloud

E-mail: Raquel@smgpa.cloud

E-mail: Annie@smgpa.cloud

Attorneys for Plaintiff

GOYARD ST-HONORE

SCHEDULE "A"
DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME, FINANCIAL
ACCOUNT INFORMATION, E-MAIL ADDRESS,
AND OTHER MEANS OF CONTACT

Def. No.	Defendant/ E-commerce Store Name	Payee	Merchant ID	Financial Account	E-mail Addresses	Other Means of Contact
1	goyardbagus.com		G76ZM2HEH7VAG		admin@goyardbagus.com	
2	goyarduksale.com	EDDIE GRIGGS @EGRIGGS 408	3V9T945J55BL4		luxuryitemswholesale@gmail.com	
3	aaareplica.nu	齐齐哈尔市变晓商贸有限公司	7Y4W2X69U8JK8	maoxiaohupp@outlook.com	service@aaareplica.nu service@aaareplica.nu	
4	bagscoll.shop	Luybagq	J4F24FFE2DGV6		support@zngogo.com	
4	blissbags.shop	LUXURYBAGSALEssc	A8Y8GSFRHE72J		Support@zngogo.com help@luybagsonline.shop	
4	luxesbag.shop	LUXBAGONLINE Luybagq	MLLCUQ5WLJB2N CPMHBE54LTRD6		Support@zngogo.com	
4	topbagsnew.shop	LUXURYBAGSALEs LUXURYBAGSALEssd	H8WS8VQZYWJEW 5NQJRJ4QRZVYN		Support@zngogo.com 547602388@qq.com Support@zngogo.com help@luybagsonline.shop	
5	buyqualitybags.com		2444YDDM2597J	79886689@qq.com	topbagshub@gmail.com contact@topqualitybags.com	
		Tabren Aubrey Smith	RQLTT8ZY2YWL6	keithgrainger90@outlook.com		
5	topqualitybags.com		KV5T4GV3KAKZJ	Usamamanzoortstripe@gmail.com	topbagshub@gmail.com	

					contact@topqualitybags.com	
6	byaneity.com	Byaneity	GNJEDFUTP XESS		service@unigav e.com service@byaneit y.com	
7	casebig.com		TFSNLFL6A NVF6		favocase@gmail .com sales@Casebig. com	
8	casefeely.com	CASEFEEL Y	Y4HM7FMW 95PWW		support@casefe ely.com	
9	caseshunter.com		VAYBUU357 F444		admin@caseshu nter.com	
10	cinderellastores.com	Rokki Agbotsu	2357NLWTJ3 8GJ		info@cinderella stores.com cinderellastoren z@gmail.com	
11	crozus.com		NJU2X7GLD 5X86 CMGUNSJL VGA6		support@crozus .com	
12	designermusthave.com	Designer Must Have	THGZG4A39 BKW4			designermusthave.c om/index.php/conta ct-us-2
13	qkkbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@qkkba g.shop lagreen511@gm ail.com sales@qkkbag.s hop	
13	qnkbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@qnkba g.shop lagreen511@gm ail.com sales@qnkbag.s hop	
13	whwlbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@whwlb ag.shop cntopshoes@gm ail.com sales@whwlbag .shop	
13	wmtbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@wmtba g.shop alexissaveryrpe	

					ws@gmail.com cntopshoes@gmail.com sales@wmtbag.shop	
13	wshubag.shop	文 智弘 @41y8	KF29JLWXM CQWA	asd763881227 @163.com	support@wshubag.shop worldsroderickt hyiqph@gmail.com sales@wshubag.shop	
13	xknbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@xknbag.shop cntopshoes@gmail.com sales@xknbag.shop	
14	gorchic.com	Hefei Jiao Kun Trading Co., Ltd.	PT465C2FK4 F7S		service@gorchic.com	
14	gorchic.us	Hefei Jiao Kun Trading Co., Ltd.	PT465C2FK4 F7S		service@gorchic.com	
			ZU5WRREP DXNK4			
				lindashuai1995 @gmail.com	service@gorchic.com service@gorchic.net	
15	high-endbags01.com		WHFLXXCT HQ2QY	cong_0617@qq.com	xxx@163.com	
16	jojokkrelicas.com	福根 伍	FZ3HYPANX XR5Q	wufugen1115 @163.com	support@jojokkrelicas.net	
17	karanfrank.ru			2315162318@qq.com	karanfrankk@outlook.com	
18	luxeebag.com	LuxeeBag	CM4ECTF5E NA9Y		support@luxeebag.com	
19	luxuryoubag.com	FindingLuxury	8SG3KGHCT C9BG		contact@luxuryoubag.com	
20	mafoi.shop		ZQBVLPZ48 7SS4	segadiarra@gmail.com	customers@mafoi.shop clients@mafoi.shop	
21	merchprintz.com	MerchPrintz	DXS6FASUE QG2Q		support@merchprintz.com	

22	peesty.com		K9NVCKFEB T27W		sale@temafes.bi z support@temafe s.net	
22	temaap.com		K9NVCKFEB T27W		support@temaa p.com support@fasbag s.shop	
22	temafes.us		K9NVCKFEB T27W		sale@temafes.bi z support@temafe s.net	
23	racastudyo.com	Raca Studyo Pty Ltd	SFNPZT873B UCJ		hello@racastud yo.com	
24	tgey.top	Qiansheng TRADING Co.LTD	WE4RF8RW7 CUWG		Allison54321aa @outlook.com	
25	theluxhouse.net	Fashion Venue	LVN357P5CL TWC	davidruffinjr@ yahoo.com	info@theluxhou se.net theluxhouse1@ gmail.com	
26	thetotetrove.myshopify.c om	LuxuryHub	V8A8PG45Z HLVQ		ameliaavaforyou @gmail.com store+79032254 753@t.shopifye mail.com avasophiaforyou @gmail.com	
27	vincyrep.ru	林海 柳		liulinhai188@o utlook.com	vincystore@hot mail.com admin@liomui.c om	
				rongfeng- 2022@outlook. com	vincystore@hot mail.com	
				huixiang- 2022@outlook. com	vincystore@hot mail.com	
28	viokshop.com		KF44JSYPRD 6SC	wuwupei@outl ook.com	besttopstores_se rvice@outlook.c om	
29	vittoriaparumbell.com	VittoriaParu mbell	3HZNUQB8Y TJY6		vittoriaparumbel l.com@gmail.co m	

					sales@vittoriaparmbell.com	
--	--	--	--	--	----------------------------	--